

1 CRAVATH, SWAINE & MOORE LLP
Paul H. Zumbro (*pro hac vice*)
2 (pzumbro@cravath.com)
Kevin J. Orsini (*pro hac vice*)
3 (korsini@cravath.com)
Omid H. Nasab (*pro hac vice*)
4 (onasab@cravath.com)
825 Eighth Avenue
5 New York, NY 10019
Tel: 212 474 1000
6 Fax: 212 474 3700

7 KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
8 (tkeller@kellerbenvenuti.com)
Jane Kim (#298192)
9 (jkim@kellerbenvenuti.com)
650 California Street, Suite 1900
10 San Francisco, CA 94108
Tel: 415 496 6723
11 Fax: 650 636 9251
12

13 *Attorneys for Debtors and Debtors in Possession*

14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17
18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

DECLARATION OF JANE KIM IN SUPPORT OF EX PARTE MOTION OF DEBTORS PURSUANT TO B.L.R. 9006-1 REQUESTING ORDER SHORTENING TIME FOR HEARING ON APPLICATION OF DEBTORS PURSUANT TO 11 U.S.C. § 327(a) AND FED. R. BANKR. P. 2014(a) AND 2016 FOR AUTHORITY TO RETAIN AND EMPLOY COMPASS LEXECON, LLC AS ECONOMIC CONSULTANTS TO DEBTORS *NUNC PRO TUNC* TO PETITION DATE

Related Document: Dkt. 1756

[No hearing requested]

1 I, Jane Kim, do hereby declare under penalty of perjury as follows:

2 1. I am a partner at Keller & Benvenuti LLP, attorneys for PG&E Corporation and
3 Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, “**PG&E**” or
4 the “**Debtors**”).

5 2. I submit this declaration in support of the Motion of the Debtors (the “**Motion to**
6 **Shorten**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy
7 Court for the Northern District of California, for entry of an order shortening time for a hearing on
8 May 9, 2019, at 9:30 a.m. (the “**Omnibus Hearing**”), on the *Application of the Debtors Pursuant to*
9 *11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) and 2016 for Authority to Retain and Employ*
10 *Compass Lexecon, LLC, Nunc Pro Tunc to the Petition Date* (the “**Application**”), filed
11 contemporaneously herewith. The Debtors request that written objections, if any, be due by 4:00 pm
12 on May 6, 2019.

13 3. On April 29, 2019, at 12:30 p.m. (Pacific Time), I sent an e-mail to Timothy Laffredi
14 for the Office of the United States Trustee inquiring as to whether the United States Trustee would
15 consent to notice being shortened on the Application as set forth above. As of the filing of this
16 declaration, I have not received a response.

17 4. Ample cause exists to hear the Application on shortened time at the Omnibus Hearing
18 on May 9, 2019, at 9:30 a.m. On April 24, 2019, the Court held a hearing (the “**April 24 Hearing**”)
19 at which it considered the relief requested in the *Application of the Official Committee of Unsecured*
20 *Creditors for Entry of an Order Pursuant to 11 U.S.C. §§328(a) and 1103 and Fed. R. Bankr. P.*
21 *2014(a) for Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisor Nunc Pro*
22 *Tunc to February 12, 2019* (the “**FTI Retention Application**”) [Dkt. No. 1212], filed by the Official
23 Committee of Unsecured Creditors (the “**Creditors Committee**”).

24 5. At the April 24 Hearing, the Debtors reiterated the concerns stated in their statement
25 of non-opposition with respect to the FTI Retention Application [Dkt. No. 1560], that Compass not
26 be disqualified from engagement by the Debtors by reason of FTI’s retention by the Creditors
27 Committee in light of the affiliation between FTI and Compass. Accordingly, the Court reserved
28 decision and continued the hearing on the FTI Retention Application to the hearing on May 9, 2019,

1 at 9:30 a.m. (Pacific Time), to allow the Debtors to file the Application and have it heard on
2 shortened notice at the same hearing, to avoid, in the Court's own words, "this potential of the
3 [Debtors'] own interests being jeopardized by whatever legal consequences of not letting the
4 [Debtors] hire and retain Compass" as a result of FTI's retention by the Creditors Committee.

5 6. Hearing the Application at the Omnibus Hearing will not have any effect on the
6 current schedule for these Chapter 11 Cases.
7

8 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
9 inquiry, the foregoing is true and correct and that this declaration was executed at San Francisco,
10 California, on April 29, 2019.
11

12 /s/ Jane Kim
Jane Kim
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